

**REPLY DECLARATION
OF
JAMES M. BRADBURY
ATTACHMENT 14**

COPY OF TRANSCRIPT

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

IN THE MATTER OF:

**APPLICATION OF BELL SOUTH TELECOMMUNICATION, INC.,
TO PROVIDE IN-REGION INTERLATA SERVICES PURSUANT
TO DOCKET NO. 9-55 SECTION 271 OF THE SUB 1022
TELECOMMUNICATIONS ACT OF 1996**

DEPOSITION OF

WILLIAM STACY

September 28th, 2001

9:00 a.m.

675 West Peachtree Street

Atlanta, Georgia

Elizabeth Gallo, CCR-B-1997

Alexander Gallo & Associates, Inc.

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Deposition of William StacySeptember 28, 2001

WILLIAM STACY, having been first duly sworn, was examined and testified as follows:

CROSS-EXAMINATION**BY-MR. HOPKINS:**

Q. Good morning, Mr. Stacy. I'm Mike Hopkins for AT&T. I'm going to talk a little bit about our favorite subjects, operation support systems. What would we do without them?

A. That is true.

Q. I would like to start out with learning a little bit more about your organization and where you fit and who works with you and what your responsibilities are. I have got some ORC charts I'm going to use for my reference to try to understand where you fit, but what is the overall organization that you run? What is that called?

A. It is called customer services within interconnections services. There are four or five doing-business-as names we use, but it is called interconnection services in

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1 through?

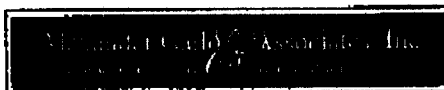
2 A.- Not on an item by item basis, but
3 I know for sure all of the items we had on
4 the table, in fact, all of the items we had
5 on the table today, potentially change
6 flow-through a few tenths of a percent.

7 I don't have any of what we call
8 big hitters left where I could fix one thing
9 and improve flow-through 20 percent or even 5
10 percent. So we are talking about stuff that
11 has been split down to hundreds of different
12 cases, and we work with the CLEC and the
13 flow-through task force to go through and
14 pick out the most urgent twenty cases.

15 In any case, we are getting
16 minimal improvements from fixing one thing.

17 Q. I guess the percentage, because it
18 is a percentage of a percentage of a
19 percentage, is hard to figure how to
20 translate that into number of LSRs. Do you
21 have any idea, if all these were implemented,
22 how many LSRs that would impact on a monthly
23 basis?

24 A. We had that in the statements of
25 work when we were doing this, but I don't



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1 remember what those numbers were. You could
2 estimate that. Let's suppose everything we
3 were doing here would improve overall
4 flow-through a half of 1 percent.

5 Again, I don't have the volumes
6 here. Let's suppose we had 400,000 LSRs in
7 the door that month. That is actually .005.
8 We would have affected 2,000 LSRs by
9 implementing all these improvements out of the
10 total.

11 So we are at the point, given
12 this list of 50,000 total on the other one.
13 In our terms, we are nibbling our way through
14 it. There is nothing I could fix 10,000 of
15 with one code change that we identified.

16 Q. Wouldn't you agree with me that
17 the so-called big hitters, at least fallout
18 by design, is basically in four, five
19 categories. The complex, which granted is a
20 number of lumping --

21 A. Right, a lump service.

22 Q. Special pricing plans, denial,
23 restore, pending orders, then directory
24 listing?

25 A. Yes. All of those are considered

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1 at different times, but the problem is, when
2 you delump those categories and say how could
3 I fix this, you find there were only 150
4 orders in that thing you just wanted to fix.
5 That is fine, but we are making relatively
6 small progress because of that.

7 Q. So is it safe to say that it is
8 unlikely there will be significant improvement
9 in manual fallout by design in the
10 foreseeable future?

11 A. I think that is fair to say
12 unless we come up with some process
13 break-through, like you suggested earlier,
14 where we in the CLEC agree to get around
15 this problem by doing something unique with
16 the LSR.

17 Q. I don't suggest that. I just ask
18 questions.

19 A. I thought that was your idea.

20 Q. I just ask questions.

21 A. If it is Mr. Bradbury's question,
22 tell him to submit it to change control. It
23 is not a bad idea.

24 Q. Then there is system errors. In
25 the last six months, has BellSouth done any

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1 programming changes to address system errors
2 that would significantly reduce system errors?

3 A. Again, we reduced them but not
4 significantly, no. We work on changes to
5 those in every release, both those that are
6 classified -- we have two terms for them.
7 If the code is not working as it was
8 intended to, we call it a defect. If it is
9 a new idea, we call it a feature.

10 But every time we go into the
11 software, there are some of those being fixed
12 or changed to try to reduce the number of
13 errors that the reps have to handle.

14 Just like the manual fallout, it
15 is all mixed together in there. There are
16 no break-through improvements from that that
17 we have been able to make or that I know of.

18 Q. You look at those?

19 A. Yes. I'm a participant in a
20 series of the OSS planning meetings. In
21 those meetings, that is one of the topics
22 that is covered.

23 Q. Now, for system errors, if you
24 were going to correct a particular error,
25 what system do you have to fix or re-code or

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Disclosure Pursuant to O.C.G.A. 9-11-28

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Elizabeth R. Gallo

ELIZABETH R. GALLO, CCR-B-1997

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3 I hereby certify that the foregoing
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7 direction; that the foregoing pages represent
8 a true, complete, and correct transcript of
9 the evidence given upon said hearing, and I
10 further certify that I am not of kin or
11 counsel to the parties in the case; am not
12 in the employ of counsel for any of said
13 parties; nor am I in anywise interested in
14 the result of said case.

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